



Jackson Lewis P.C.
58 South Service Road
Suite 410
Melville, New York 11747
Tel 631 247-0404
Fax 631 247-0417
www.jacksonlewis.com

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MY DIRECT DIAL IS: (631) 247-4647
MY EMAIL ADDRESS IS: ADAM.GUTTELL@JACKSONLEWIS.COM

October 14, 2014

VIA ECF

Magistrate Judge James Orenstein
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Lisa Fisher v. Mermaid Manor Home for Adults
Case No. 14-cv-3461 (WFK)(JO)

Dear Magistrate Judge Orenstein:

We represent Defendant Mermaid Manor Home for Adults in the above-referenced matter; and, on behalf of both parties, we submit the attached proposed Joint Discovery Plan pursuant to Part II(C) of the Case Management and Scheduling Order.

Very truly yours,
JACKSON LEWIS P.C.

A handwritten signature in black ink, appearing to read "Adam G. Guttell".

Adam G. Guttell

AGG/laf
Attachment

cc: Casey J. Wolnowski, Esq. (via ECF)

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): October 16, 2014
2. Deadline for first request for production of documents and first request for interrogatories: November 17, 2014
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) N/A ; defendant(s) N/A
3. Date for completion of any joinder of additional parties and amendment of the pleadings: January 13, 2015
- 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) TBD ; defendant(s) TBD
4. Number of depositions by plaintiff(s) of: parties 1 ; non-parties TBD
5. Number of depositions by defendant(s) of: parties 1 ; non-parties 2
6. Date of status conference (joint status report due two business days in advance): July 14, 2015
7. Date for completion of factual discovery: July 14, 2015
8. Are expert witnesses needed? Yes ☐ No ☒ *
- 8(a). Number of expert witnesses, if any, of plaintiff(s): medical N/A ; non-medical N/A
- 8(b). Date for completion of those expert reports: N/A
- 8(c). Number of expert witnesses, if any, of defendant(s): medical N/A ; non-medical N/A
- 8(d). Date for completion of those expert reports: N/A
9. Date for completion of expert discovery: N/A
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance): August 14, 2015
11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions: None

* Defendant reserves the right to expert discovery and designation of expert rebuttal witnesses if Plaintiff amends and identifies expert witnesses.

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions:

Summary Judgment
October 16, 2015

13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.)

Yes X No

14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.)

Yes No N/A

15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.)

Yes No X